

## Exhibit B

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18 *Counsel for Defendant Meta Platforms, Inc.*

19 **UNITED STATES DISTRICT COURT**  
 20 **NORTHERN DISTRICT OF CALIFORNIA**

21 **SAN FRANCISCO DIVISION**

22 RICHARD KADREY, *et al.*,  
 23 Individual and Representative Plaintiffs,  
 24 v.  
 25 META PLATFORMS, INC., a Delaware  
 corporation;  
 26  
 27 Defendant.

Case No. 3:23-cv-03417-VC

**DEFENDANT META PLATFORMS, INC.'S  
 OBJECTIONS AND RESPONSES TO  
 PLAINTIFFS' FOURTH SET OF REQUESTS  
 FOR PRODUCTION**

1     **RESPONSE TO REQUEST No. 77:**

2           Meta incorporates by reference its objections and definitions above, including to the term  
 3     “Meta Language Model.” Any electronic communications, including email and documents attached  
 4     thereto, will only be produced pursuant to and in accordance with the ESI Order.

5           Meta objects to this Request because, on its face, it does not exclude documents and  
 6     communications exchanged with or at the direction of Meta’s attorneys concerning legal advice or  
 7     opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such  
 8     documents will not be produced.

9           Meta objects to this Request as vague and ambiguous as to the phrasing “Communications  
 10    Concerning licensing copyrighted works,” which appears to be missing one or more words. Meta  
 11    further objects to this Request as vague, ambiguous, and unduly burdensome as to the term  
 12    “copyrighted works,” as Meta is not in a position to know whether any particular work is subject  
 13    to copyright protection. Meta will construe this Request to seek communications concerning  
 14    Meta’s negotiations of licenses for datasets, if any, that were used to train the Meta Language  
 15    Models (as construed above).

16           Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the  
 17    needs of the case to the extent that it seeks all communications concerning the subject matter of the  
 18    Request, including documents with limited, if any, relevance to Plaintiffs’ copyright infringement  
 19    allegations and Meta’s defenses thereto.

20           Subject to and without waiving the foregoing objections, and pursuant to the terms of the  
 21    Protective Order and ESI Order, Meta has conducted a reasonable search and did not locate  
 22    communications in its possession, custody, or control concerning the negotiation of licenses for  
 23    datasets that were used to train the Meta Language Models (as construed above).

24     **REQUEST FOR PRODUCTION No. 78:**

25           Documents sufficient to show what the term “invite-only” means as used by Defendant in  
 26    ECF No. 105.

27     **RESPONSE TO REQUEST No. 78:**

28           Meta incorporates by reference its objections and definitions above. Any electronic

1 communications, including emails and documents attached thereto, will only be produced pursuant  
2 to and in accordance with the ESI Order.

3 Meta objects to this Request because, on its face, it does not exclude documents and  
4 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or  
5 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such  
6 documents will not be produced.

7 Meta objects to this Request on the ground that it seeks information that is not relevant to  
8 any party's claims or defenses.

9  
10 Dated: September 30, 2024

COOLEY LLP

11 By: /s/Judd Lauter  
12 Bobby Ghajar  
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